

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMANZAR,	*	
	*	
Plaintiff,	*	
	*	
v.	*	Civil Action No.
	*	1:19-cv-01301-WMR
	*	
LATASHA TRANSRINA KEBE et al.,	*	
	*	
Defendants.	*	

**[PROPOSED] ORDER GRANTING DEFENDANT KEBE’S
MOTION TO FILE DOCUMENTS UNDER SEAL**

This matter having come before the Court on the Motion to File Documents Under Seal filed by Defendant Kebe (hereinafter referred to as “Ms. Kebe”), based upon the Court’s review of Ms. Kebe’s motion and the record, and for other good cause shown, IT IS HEREBY ORDERED that the Clerk shall file the initial pleadings and supporting documents identified below under seal:

1. The following supporting documents to Kebe’s Motion to Compel Full and Complete Responses to Kebe’s First Continuing Interrogatories:
 - a. Kebe’s Brief in Support of her Motion to Compel Full and Complete Responses to Kebe’s First Continuing Interrogatories (hereinafter referred to as “Kebe’s Brief”);
 - b. Exhibit 1 to Kebe’s Brief: Kebe’s First Continuing Interrogatories;

- c. Exhibit 2 to Kebe's Brief: Plaintiff's Responses to Kebe's Interrogatories;
- d. Exhibit 3 to Kebe's Brief: Deficiency Letter addressing Plaintiff's Responses to Interrogatories, sent to Plaintiff's counsel on August 31, 2020;
- e. Exhibit 4 to Kebe's Brief: Plaintiff's Supplemental Responses to Kebe's Interrogatories;
- f. Exhibit 5 to Kebe's Brief: Discovery Dispute Letter sent to Ms. Lundy on November 30, 2020;
- g. Exhibit 6 to Kebe's Brief: Plaintiff's Discovery Deficiency Chart created on December 4, 2020;
- h. Exhibit 7 to Kebe's Brief: Email sent to Plaintiff's counsel on December 4, 2020, with the Discovery Deficiency Chart attached;
- i. Exhibit 8 to Kebe's Brief: Plaintiff's Second Supplemental Responses to Kebe's Interrogatories;
- j. Exhibit 9 to Kebe's Brief: Subpoena for Deposition, sent to Rashad Haughton on November 3, 2020; and
- k. Exhibit 10 to Kebe's Brief: Subpoena for Document Production, sent to Rashad Haughton on November 3, 2020.

2. The following supporting documents to Kebe's Motion to Compel Full and Complete Responses, and Production, to Kebe's First Requests for Production of Documents and Things:
 - a. Kebe's Brief in Support of her Motion to Compel Full and Complete Responses, and Production, to Kebe's First Requests for the Production of Documents and Things (hereinafter referred to as "Brief in Support");
 - b. Exhibit 1 to Brief in Support: Kebe's First Requests for the Production of Documents and Things;
 - c. Exhibit 2 to Brief in Support: Plaintiff's Responses to Requests for Production;
 - d. Exhibit 3 to Brief in Support: Deficiency Letter addressing Plaintiff's Responses to First Requests for Production, sent to Plaintiff's counsel on August 31, 2020;
 - e. Exhibit 4 to Brief in Support: Email sent to Plaintiff's counsel on September 17, 2020, regarding overdue production.
 - f. Exhibit 5 to Brief in Support: Plaintiff's Supplemental Responses to Requests for Production;

- g. Exhibit 6 to Brief in Support: Discovery Dispute Letter sent to Ms. Lundy on November 30, 2020;
- h. Exhibit 7 to Brief in Support: Plaintiff's Discovery Deficiency Chart created on December 4, 2020;
- i. Exhibit 8 to Brief in Support: Email sent to Plaintiff's counsel on December 4, 2020, with the Discovery Deficiency Chart attached;
- j. Exhibit 9 to Brief in Support: Plaintiff's Second Supplemental Responses to Requests for Production;
- k. Exhibit 10 to Brief in Support: Notice to Preserve Data, mailed to Facebook, Inc. on June 14, 2019;
- l. Exhibit 11 to Brief in Support; Facebook, Inc. Reply Letter, dated June 28, 2019.

Such materials shall remain sealed until this Court orders otherwise.

IT IS SO ORDERED, this _____ day of _____, 20__.

William M. Ray, II
United States District Judge